

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

SANDRA RODRÍGUEZ-COTTO;
RAFELLI GONZÁLEZ-COTTO

Plaintiffs,

v.

WANDA VÁZQUEZ-GARCED, Governor of
Puerto Rico; **DENNISE N. LONGO-QUIÑONES**,
Secretary of Justice of Puerto Rico; **PEDRO**
JANER, Secretary of the Department of Public
Safety of Puerto Rico; **HENRY ESCALERA**,
Commissioner of the Puerto Rico Police Bureau,
all in their official capacities

Defendants.

CIVIL No. 20-01235 (PAD)

RE: Preliminary and Permanent
Injunction

MOTION FOR LEAVE TO FILE SUR-REPLY BRIEF IN EXCESS OF PAGES

TO THE HONORABLE COURT:

COME NOW, co-defendants **Wanda Vázquez-Garced**, Governor of Puerto Rico; **Dennise N. Longo-Quñones**, Secretary of Justice of Puerto Rico; **Pedro Janer**, Secretary of the Department of Public Safety of Puerto Rico; and, **Henry Escalera**, Commissioner of the Puerto Rico Police Department, all in their official capacities, without waiving any right or defense arising from Title III of *Puerto Rico Oversight, Management and Economic Stability Act* ("PROMESA"), 48 U.S.C. §§2101 *et seq.*, and the Commonwealth's Petition under said Title or under this case and without submitting to the Court's jurisdiction, and through the undersigned attorney, very respectfully **STATE** and **PRAY** as follows:

1. On this date, in compliance with the Court's Order at docket entry No. 5, Defendants will file a sur-reply to *Plaintiffs' Reply Memorandum in Support for Preliminary Injunction*.

2. In accordance with Local Rule 7(d) except by prior leave of Court, a sur-reply motion to an injunctive relief motion shall not exceed ten (10) pages.

3. The appearing defendants strenuously worked toward fitting the sur-reply into the page limit set by Local Rule 7(d). However, given the additional myriad of claims and allegations brought by Plaintiffs in their *Reply Memorandum*, the argumentation of these complex matters took additional pages in excess of the limit established by the local rule.

4. Defendants respectfully request the indulgence of this Honorable Court and request that it grant them leave to file its sur-reply to *Plaintiffs' Reply Memorandum in Support for Preliminary Injunction* in excess of ten (10) pages.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and grant Defendants leave to file their sur-reply to *Plaintiffs Reply Memorandum in Support for Preliminary Injunction* in excess of the ten (10) page limit set by Local Rule 7(d).

I HEREBY CERTIFY that the undersigned attorney electronically filed the foregoing with the Clerk of the Court, which will send notification of such filing to the parties subscribing to the CM/ECF System.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of June 2020.

DENNISE N. LONGO-QUIÑONES

Designated Secretary of Justice

WANDYMAR BURGOS-VARGAS

Deputy Secretary in Charge of Litigation

SUSANA I. PEÑAGARÍCANO-BROWN

Director of Legal Affairs

Federal Litigation and Bankruptcy Division

/s/ **Juan C. Ramírez-Ortiz**

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